

Policy No: HR-PO-001

1 PURPOSE

This document is the property of City Facilities Management Group of Companies (Asia) which includes the following:

No.	Country	Company Name
1.	Malaysia	City Facilities Management Sdn Bhd
2.	Singapore	City Facilities Management (SGP) Pte. Ltd.
3.	Hong Kong	City Facilities Management (HKG) Limited
4.	Macau	City FM (Macau) Limited

City Facilities Management Group of Companies (Asia) and its related bodies corporate (collectively “**City FM**”) are committed to providing quality services to you. This policy outlines how we manage your Personal Data in accordance with the local laws and regulations.

No.	Country	Act
1.	Malaysia	Malaysia Personal Data Protection Act 2010 (“PDPA”)
2.	Singapore	Singapore Personal Data Protection Act 2012 (“PDPA”)
3.	Hong Kong	Personal Data (Privacy) Ordinance (“PDPO”)
4.	Macau	Personal Data Protection Act (Act 8/2005) (“The Act”)

The local laws and regulations regarding Personal Data govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Data.

2 SCOPE

2.1 What kinds of Personal Data do we collect?

“Personal Data” means the personal data of the employee that pertains to his or her employment with the Company.

Personal Data means information which can be used to identify that individual. It must also exist in a form which access to or processing of is practicable. Examples of Personal Data includes information such as names, addresses, e-mail addresses, phone and facsimile numbers. We may collect log-in information such as usernames and passwords which you create for accounts with us, or technical information from your use of our website and apps (such as your IP address).

We may also collect information (such as bank account details) and/or product information such as details of how you use our services and records of our communication with you.

We may collect your Personal Data in many ways including correspondence, by telephone, by e-mail, via our apps, from media and publications, from other publicly available sources and from third parties.

We may also collect Personal Data when you register an account with us, order products or services from us, apply for a job with us, or submit a query or request to us.

When we collect Personal Data we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it. We may also use and disclose your information for other purposes as authorised by you, or in accordance with your requests or instructions.

2.2 Purposes for which we use and disclose Personal Data

We use and disclose Personal Data that we collect about you for the following purposes:

- a) administering your employment contract and providing the appropriate services and benefits to you;
- b) providing information to our clients;
- c) to answer your queries or requests;
- d) to comply with our legal and regulatory obligations;
- e) to carry out market analysis and research;
- f) to monitor use of, assess, maintain, upgrade and improve our products and services;
- g) to carry out training programs for our personnel;
- h) to manage and resolve any legal or commercial complaints or issues;
- i) to keep you informed about our activities; and
- j) sending your Personal Data overseas within City FM's operations and/or the operations of any related body corporate of City FM in order to administer your employment contract and/or retaining copies of such information for administrative / security purposes.

3 THIRD PARTIES

Where we collect Personal Data from you, we will generally do so directly ourselves. However, in some cases we may collect Personal Data from a third party with your prior consent, such as through your representatives, contractors who provide services to us, or third parties who refer you to us because they think you may be interested in our products or services.

4 DISCLOSURE OF PERSONAL DATA

We may disclose your Personal Data to:

- a) your representatives, advisers and others you have authorised to interact with us on your behalf;
- b) our personnel who need the information to discharge their duties;
- c) HR data intermediaries of the Company which perform a human resources function;
- d) related entities within our corporate group;
- e) our business partners, agents and service providers;
- f) payment system operators and financial institutions;
- g) prospective purchasers of all or part of our business or shares in our company or a related entity;
- h) professional advisers who we engage to provide advice on our business;
- i) government authorities who ask us to disclose that information, or to other people as required by law;

- j) third parties (e.g., provident fund service provider, health insurer and payroll service provider) and/or City FM's HR data intermediaries and the subsequent use of such personal data by such HR data intermediaries to provide you with the appropriate services and benefits.
- k) In some cases, we may send your Personal Data overseas within City FM's operations and/or the operations of any related body corporate of City FM for the purposes mentioned in clause 2.2.

5 SECURITY OF PERSONAL DATA

Your Personal Data is stored in a manner that reasonably protects it from unauthorized access or accidental access, processing, modification, erasure, loss, use or disclosure.

When your Personal Data is no longer needed for the purpose for which it was obtained, we will take all practicable steps to erase Personal Data that is no longer required for the purpose for which the data is used, unless erasure is prohibited by law or is not in the public interest.

6 ACCESS TO YOUR PERSONAL DATA

You may access the Personal Data we hold about you and update and/or correct it, subject to certain exceptions. If you wish to access your Personal Data, please contact Human Resources Department in writing. City FM will not charge any fee for your access request but may charge an administrative fee if any for providing a copy of your Personal Data.

In order to protect your Personal Data, we may require identification from you before releasing the requested information. There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases, we will let you know why we cannot comply with your request.

7 MAINTAINING THE QUALITY OF YOUR PERSONAL DATA

It is an important to us that your Personal Data is up to date. We will take reasonable steps to make sure that your Personal Data is accurate, complete and up-to-date. You have the right to request access to and correction of your own Personal Data. If you find that the information we have is not up to date or is inaccurate, please advise Human Resources Department as soon as practicable so we can update the records and ensure we can continue to provide quality services to you.

8 OPENNESS & TRANSPARENCY

City FM will take all practicable steps to ensure openness of their Personal Data policies and practices, the kind of Personal Data held and the main purposes for holding it.

9 COMPLAINTS & ENQUIRIES

City FM tries to meet the highest standards in order to protect your privacy. However, if you are concerned about the way in which we are managing your Personal Data and think we may have breached the local laws and regulations or any other relevant obligations, or if you have any enquiry, please contact us using the contact details set out below. Complaints must be lodged in writing. We will deal with the matter within a reasonable time, and will keep you informed of the progress of our investigation.

If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved satisfactorily, you can contact us to discuss your concerns. You are also entitled to make a complaint to the local authorities as details set out below.

a) **For Malaysia**

Attention To	Head of Human Resources
Address	A-9-2 & A-9-3, Level 9, Tower A, Menara UOA Bangsar, No. 5, Jalan Bangsar Utama 1, 59000 Kuala Lumpur
Contact No.	+60 3 2721 9300
E-mail Address	tan.kienlok@cityholdings.asia

Authorities' details:

Malaysia Department of Protection of Personal Data | website: <https://www.pdp.gov.my>

b) **For Singapore**

Attention To	Human Resources Manager
Address	152 Beach Road, #11-03/04A Gateway East, Singapore 189721
Contact No.	+65 6951 8230
E-mail Address	Derek.Tang@cityholdings.asia

Authorities' details:

Personal Data Protection Commission Singapore | website: <https://www.pdpc.gov.sg>

c) **For Hong Kong & Macau**

Attention To	Head of Human Resources
Address	37F AIA Tower, Landmark East, 100 How Ming Street, Kwun Tong, Hong Kong
Contact No.	+852 3708 5418
E-mail Address	Nora.Chan@cityholdings.asia

Authorities' details:

Hong Kong, Privacy Commissioner for Personal Data | website: <https://www.pcpd.org.hk>

Macau, The Office for Personal Data Protection ("GPDP") | website: <https://www.gpdp.gov.mo>

10 POLICY UPDATES

This Policy may change from time to time and the latest version of this Policy is available on our website.

11 DOCUMENT CONTROL

Approval

	Title	Name	Date
Administrator	Head of HR – MYS, SGP & HK	N/A	1 June 2020
Approver	Regional Director – Asia	Mark Bradley	1 June 2020

Version History

The following table lists the changes made to this Policy:

Version	Date	Amended By	Brief Summary of Changes